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T.R.A. DOCKET ROOM

September 26, 2003

Ron Jones
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Tenn. Code Ann § 65-21-114 Workshop

Dear Mr. Jones:

As per your letter dated September 16, 2003, North Central Telephone Cooperative, Inc. (NCTC) is submitting the requested response concerning county wide calling. NCTC follows the procedures stated in Tenn. Code Ann § 65-21-114 providing toll-free access between two points in the same county. NCTC provides telephone service to Macon and parts of Clay, Smith, Sumner and Trousdale counties. NCTC has connecting facilities with Twin Lakes Telephone Cooperative, Inc. for Clay County and connects with BellSouth for the remaining counties.

BellSouth maintains a statewide TAR file which contains all the telephone numbers in Tennessee by county. NCTC submits our telephone numbers to BellSouth which combines similar files from each telephone company in the state to create one file. This file is then sent to each participating telephone company in the state which is then incorporated into each company's billing system. This file enables each company's billing system to determine the county of origin and termination and rate accordingly by dropping same county calls from the billing system. Normally, we receive the TAR file bi-weekly. By maintaining this file NCTC is able to verify county-wide calling for each of our customers and be in compliance with Tenn. Code Ann § 65-21-114.

Also, as requested in your letter, identify any technical, operational, administrative, or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a). NCTC has encountered problems when some carriers, esp. CLECs, are not participating in the TAR file maintained by BellSouth. Apparently some CLECs are establishing exchanges in Smith and Sumner County and are not sending the telephone numbers to BellSouth for inclusion into the county-wide TAR file. The following result is that NCTC bills county-wide calls because we do not know the county of termination.

In order to correct this problem NCTC would suggest that all telephone carriers in the state participate in the county-wide TAR file that is being maintained by BellSouth. If all carriers participated in this program each company would know the county of termination for each telephone number in the state.

Should you have any questions, please contact me.

Sincerely,

Johnny L. McClanahan
VP Finance and Administrative Services

872 HWY. 52 BYPASS EAST
P.O. Box 70
LAFAYETTE TN 37083-0070

PHONE: 615-666-2151
www.nctc.com
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1574 OLD GALLATIN ROAD
P.O. Box 96
SCOTTSVILLE KY 42164

PHONE: 270-622-7500

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2003 OCT 1

AMERICAN DIAL TONE

I.R.A. DOCKET ROOM

September 30, 2003

Docket 03-00502
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Dear Sir or Madam:

In regards to your Memo Dated September 16, 2003 concerning Docket 03-00502.

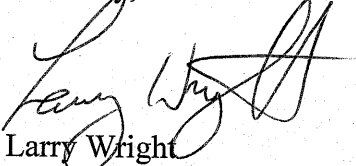
GANCOC, INC. dba American Dial Tone is a reseller of local service in Tennessee. We have an interconnection agreement with BellSouth.

Regarding Compliance with Tenn. Code Ann. 65-21-114(a):

- We order local service thru BellSouth using LENS & TAG, when ordering we block all extended area calls. Our customers are provided unlimited local calls as specified by BellSouth.
- As a reseller we must rely on BellSouth's compliance with defining the local calling area.
- No suggestions at this time.

If you have any questions, please contact me at 7277238411 ext 102, or email lwright@americandialtone.com.

Sincerely,


Larry Wright
Vice President



P.O. Box 1995
Dickson, Tennessee 37056-1995
201 Skyline Drive
Dickson, Tennessee 37055

Customer Service Local Voice: 615-446-2010
Customer Service Toll Free Voice: 1-888-252-9906
Customer Service Local Fax: 615-446-9207
Customer Service Toll Free Fax: 1-888-252-9518
E-Mail: TNTEL@bellsouth.net

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T.R.A. DOCKET ROOM

Tennessee Regulatory Authority
C/o Ron Jones
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Response to Docket No. 03-00502

Mr. Jones,

In response to complying with Tenn. Code Ann. 65-21-114 and as a CLEC who is reselling service, we will comply with this regulation by following the lead of our Local Exchange Carriers.

We do not anticipate having to make any changes ourselves to comply with this regulation, but will take the necessary steps to do so if needed.

Please contact me directly with any questions at 615-229-2123.

Sincerely,

A handwritten signature in cursive script that reads 'Matt J. Davis'.

Matt Davis
Tennessee Telephone Service

R. DALE GRIMES
TEL: (615) 742-6244
FAX: (615) 742-2744
dgrimes@bassberry.com

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2003 OCT -1

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October 1, 2003

VIA HAND DELIVERY

Ms. Deborah Taylor Tate, Chairman
TENNESSEE REGULATORY AUTHORITY
460 James Robertson Parkway
Nashville, Tennessee 37243

**Re: *Workshop to Gather Information from the Telecommunications Industry
Related to Preventing Violations of Tenn. Code Ann. § 65-21-114,
Docket No. 03-00502***

Dear Chairman Tate:

Enclosed for filing in the above-styled matter are the original and thirteen copies of Crockett Telephone Company, Inc., Peoples Telephone Company, and West Tennessee Telephone Company's response to Director Jones' request for information in the above-referenced docket. Should you have any questions with respect to this filing, please do not hesitate to contact me at the number shown above.

Thanking you in advance for your assistance with this matter, I am

Very truly yours,



R. Dale Grimes

RDG/ts
Enclosures

Cc: Ms. Lera Roark
 Mr. Greg Eubanks

September 25, 2003

Re: Docket 03-00502

Workshop to Gather Information from the Telecommunications Industry Related
to Preventing Violations of Tenn. Code Ann. 65-21-114

Crockett Telephone Company, Inc.
Peoples Telephone Company
West Tennessee Telephone Company, Inc.

1. Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. 65-21-114(a).

Response:

The above companies provide a TAR code list for all subscribers within their franchised serving area to BellSouth every two weeks in the approved industry format. Every alternate week BellSouth provides an updated TAR code list which includes all companies who have input data to BellSouth within the required time frame.

Upon receipt of the TAR code database list, the list is loaded in the company's database and a comparison of previous data and current data is made to determine if exchanges are missing, from the new data or other obvious errors can be detected. If an exchange is missing the prior tape is used to extract data for the missing exchange. If the data appears to be correct, the TAR code database is loaded prior to implementing the rating process for toll.

Each outgoing toll call is compared against the database to determine if the calling party and the called party have the same TAR code. If the TAR code is the same, the call is extracted from the billing system at this point. If the called party is not present in the database or has a TAR code that does not match the calling party, the call is kept in the system for rating and further processing.

If a call is rated as toll because the database is inaccurate and it appears on the customer billing, upon inquiry or notification by the customer, the call is researched against the database at time of call rating, the current database to see if the called party is now in the database or has had a TAR code change. If found, the date in the record is compared against the date of the call to determine if the call qualified as a countywide free call. If both of these steps do not resolve the problem, BellSouth is contacted regarding the database. If no information can be obtained from BellSouth, the company that serves the called party is contacted to try to determine and validate the TAR code of the called party. If the called party's company confirms a TAR code that matches with the calling party, credit is issued to the customer. If no match is found and/or validated, the party questioning the call is provided the information and the call is treated as a toll call.

2. Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. 65-21-114(a).

Response:

Each company provides data to BellSouth on a 2-week round, and the following week BellSouth issues an updated TAR code database to the parties participating in the TAR code database. This results in a minimum 3-week lag time in data to qualify a toll call as countywide free calling. If data is missing and a company does not have a procedure to extract data from a previous database, then data can be as old as 5 weeks or longer.

These problems result in a labor intensive validation problem when calls cannot be qualified as countywide free calling.

When a CLEC starts up and they are unaware or unable to provide their data for both ported numbers or new NXX's, it may be months before the data is included in the database. This also results in customer problems.

3. Provide a suggestion for how this workshop should proceed.

Response:

The workshop should cover, at a minimum, the following:

CLEC instructions on how to submit data to the TAR code database, including EMI format, and a test file to be sent to establish that data can be provided to BellSouth's database prior to actually providing service to end user customers.

Instructions on how to work with various parties to resolve customer problems due to lag time in database activity including contact names and numbers.

Consideration of possible ways to improve the lag time in accurate data and what affect it may have on smaller companies and service bureaus.

Although this docket does not appear to address the issue, the necessity of validating CABS billing records against the database should be included.